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**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Zakari Perry,

Plaintiff,

vs.

Trans Union LLC, *et al.*,

Defendants.

Case No. 2:20-cv-01500-APG-NJK

**JOINT MOTION AND ORDER TO
EXTEND DEFENDANT BARCLAYS BANK
DELAWARE'S TIME TO RESPOND TO
COMPLAINT**

[FIRST REQUEST]

COME NOW Plaintiff Zakari Perry ("Plaintiff") and Defendant Barclays Bank Delaware ("Barclays," together with Plaintiff, the "Parties") by counsel and pursuant to Local Rule IA 6-1, jointly move for an extension as follows:

STATEMENT OF JOINT MOTION

1. On August 12, 2020, Plaintiff filed a Complaint with this Court [ECF No. 1].
2. Barclays was served with the Complaint on or about August 17, 2020.
3. Barclays' response to the Complaint is due by September 8, 2020. *See* Fed. R. Civ. P. 12(a)(1)(A)(i).
4. The Court may extend a response date either on its own or upon a request made before the time to act has expired. *See* Fed. R. Civ. P. 6(b)(1)(A). Accordingly, this Joint Motion is timely as September 8, 2020 is the date upon which Barclays is currently required to respond to the Complaint.
5. Further, good cause exists as to the Parties' requested extension. Barclays requires

1 additional time to investigate Plaintiff's claims and to prepare its response. Moreover, the parties are
 2 engaging in preliminary discussions in this matter. These discussions are ongoing. To preserve this
 3 Court's valuable time and resources, and in the interest of judicial economy, the Parties respectfully
 4 request a twenty (20) day extension of time for Barclays to respond to the Complaint, through and
 5 including September 28, 2020.

6 5. Counsel for Barclays conferred with counsel for Plaintiff regarding this extension and
 7 Joint Motion. Counsel for Plaintiff agrees to the requested extension.

8 6. This Joint Motion is filed in good faith and not for dilatory or other improper purpose.
 9 Plaintiff would not suffer any prejudice by the Court permitting Barclays the requested extension of
 10 time and has consented to the requested extension.

11 7. This is the first request for extension of time for Barclays to respond to the Complaint.

12 DATED: September 2, 2020.

DATED: September 2, 2020.

13 /s/ J Christopher Jorgensen

/s/ Michael Kind

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18 *Attorney for Defendant Barclays Bank*
 19 *Delaware*

Attorney for Plaintiff

ORDER

IT IS SO ORDERED

23 
 24 UNITED STATES MAGISTRATE JUDGE

25 DATED: September 3, 2020
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